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DISTRICT OF COLUMBIA AND NEW YORK BARS

June 21, 2023

FILED UNDER SEAL

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Juan Carlos Ramirez-Abadia
Criminal Docket No. 09-772 (BMC)

Dear Judge Cogan:

The parties have reached an agreement in which the defendant will plead to an 11(c)(1)(C) plea with a range of 19-25 years of imprisonment. The new agreement would further reflect the forfeiture the defendant has paid thus far.

The defendant would rely on the previous allocution in this case, subject to the Court's approval, while entering a new plea of guilty to the new plea agreement.

The government has advised that they will draft the agreement and send it to defense counsel for our review.

We would hope to get this matter scheduled for a new plea and sentencing as soon as possible, subject to the Court's calendar and subject to the availabilities of all counsel. In an effort to facilitate setting a new date, I will include dates that are **not good** for counsel. I have been advised that mid-July is difficult for Mr. Nalven because he will be out of the country traveling on business. The Zapps are unavailable from now until July 10. The government has advised that they are unavailable from late July until mid-August. If the court could schedule this for sometime within the week of August 14, I think that works for everyone. (I am unavailable August 23, 24, and 25.)

Thank you,

/s/Johanna S. Zapp
Attorney for Juan Carlos Ramirez Abadia

cc: Marietou Diouf, AUSA
Paul Nalven, Esq.
David Zapp, Esq.

